

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

RAMAS CAPITAL MANAGEMENT, LLC,
GANESH H. BETANABHATLA,

Defendants.

C.A. No.: 4:22-cv-2979

Jury Trial Demanded

**PLAINTIFF’S STIPULATION OF DISMISSAL
AS TO DEFENDANT RAMAS CAPITAL MANAGEMENT, LLC**

Plaintiff Securities and Exchange Commission (“SEC”) files this Stipulation of Dismissal as to Defendant Ramas Capital Management, LLC (“Ramas”), and respectfully show the Court as follows:

1. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the SEC hereby dismisses its claims against Ramas in the above-captioned action without prejudice to refile same, and with each party to bear its own fees and costs. This is the first such dismissal as to Ramas.
2. All parties who have appeared herein have signed this Stipulation as agreed to form and substance as is required by Rule 41(a)(1)(A)(ii).

3. Voluntary dismissal by stipulation is effective on filing and does not require the Court's approval. *See SmallBizPros, Inc. v. MacDonald*, 618 F.3d 458, 461 (5th Cir. 2010). However, in the interest of clarity, the SEC herewith submits a proposed Order of Dismissal, and respectfully requests that the Court enter such an order. *See also* FED. R. CIV. P. 41(a)(2).

4. The relief requested herein is not sought for the purpose of delay but so that justice may be done.

CONCLUSION

For the foregoing reasons, the SEC, along with all parties who have appeared, stipulate to the dismissal of the SEC's claims in this action against Ramas without prejudice to the refile of same, and respectfully request that the Court enter the Order of Dismissal.

Dated: June 29, 2023

Respectfully submitted,

/s/ Keefe M. Bernstein

Keefe M. Bernstein

Attorney-in-Charge

Texas Bar No. 24006839

S.D. Texas Bar No. 24448

Securities and Exchange Commission

801 Cherry Street, Suite 1900

Fort Worth, TX 76102

(817) 900-2607 (phone)

(817) 978-4927 (facsimile)

bernsteink@sec.gov

Counsel for Plaintiff

Securities and Exchange Commission

**Stipulated and Agreed as to Form and Substance on behalf of Defendants
Ramas Capital Management, LLC and Ganesh H. Betanabhatla:**

/s/ Hector R. Chavez (with permission)

SMYSER KAPLAN & VESELKA, L.L.P.

David Isaak

State Bar No. 24012887

S.D. ID No. 26694

Hector R. Chavez

State Bar No. 24078335

S.D. ID No. 1364992

717 Texas Avenue, Suite 2800

Houston, Texas 77002

Phone: (713) 221-2300

Fax: (713) 221-2320

disaak@skv.com

hchavez@skv.com

Attorneys for Defendants Ramas Capital Management, LLC
and Ganesh H. Betanabhatla

CERTIFICATE OF CONFERENCE

Counsel for the parties conferred and have agreed to the relief sought by this motion.

/s/ Keefe M. Bernstein
Keefe M. Bernstein

CERTIFICATE OF SERVICE

I affirm that on June 29, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court for the Southern District of Texas, Houston Division, by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

/s/ Keefe M. Bernstein
Keefe M. Bernstein